Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Resilient Networks	)	PS Docket No. 21-346
Amendments to Part 4 of the Commission's Rules Concerning Disruptions to Communications	)	PS Docket No. 15-80
	)	ET Docket No. 04-35
New Part 4 of the Commission's Rules Concerning Disruptions to Communications	)	
	)	

COMMENTS OF
AMERICAN TOWER CORPORATION

American Tower Corporation ("American Tower") hereby submits these comments in response to the Notice of Proposed Rulemaking from the Federal Communications Commission ("Commission"), released October 1, 2021, seeking comment on steps to improve the reliability and resiliency of communications networks during emergencies.[1] Natural disasters from Hurricane Katrina in 2005 to the California Wildfires and hurricanes of 2021 have highlighted the importance of wireless connectivity during times of critical need. American Tower appreciates the opportunity to comment on this important item.

As commenters have noted in other dockets, the wireless industry (led by carriers and supported by infrastructure companies and other service providers) has worked diligently over many years to improve the reliability and resiliency of wireless communications networks.[2]

[1] *See In the Matter of Resilient Networks*, *et al.,* PS Docket No. 21-346, *et al.,* Notice of Proposed Rulemaking, FCC 21-99 (rel. Oct. 1, 2021) ("NPRM").

[2] *See Public Safety and Homeland Security Bureau Seeks Comment on Wireless Service Providers' Safety Measures for Their Customers During Disasters in Connection with the Consolidated Appropriations Act of 2021*, PS Docket No. 11-60, 36 FCC Rcd. 5944 (rel. Mar. 26, 2021); Comments of T-Mobile USA, Inc., PS Docket No. 11-60 (filed April 26, 2021) ("T-Mobile Comments"); Comments of AT&T, PS Docket No. 11-60 (filed April 26, 2021) ("AT&T Comments"); Comments of Verizon, PS Docket No. 11-60 (filed April 26, 2021) ("Verizon Comments");

There is no one-size-fits-all solution to improving wireless communication resiliency, so industry efforts have required a great deal of collaboration between a variety of key stakeholders and policymakers. American Tower thanks the Commission for its efforts to date in helping the wireless industry to improve network resiliency and looks forward to continuing to work with the Commission and our carrier customers to develop solutions to limit network downtimes.[3]

I. INTRODUCTION

American Tower is a global real estate investment trust and a leading independent owner, operator, and developer of multi-tenant communications real estate. American Tower currently owns and manages more than 42,000 wireless communications sites in the United States. As a provider of wireless infrastructure and infrastructure services, American Tower is keenly aware of the challenges faced by wireless providers in keeping their networks operational. Over the years, American Tower has worked to develop and implement solutions to help our carrier customers keep their networks online during emergencies.

II. BACKUP POWER

As the Commission noted, one of the primary reasons for wireless network service disruptions is the loss of electric power from the grid.[4] To address this issue, American Tower and our carrier customers have worked to develop backup power programs to keep wireless

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Comments of the Wireless Industry Association, PS Docket No. 11-60 (filed April 26, 2021); Comments of CTIA, PS Docket No. 11-60 (filed April 26, 2021).

[3] American Tower is grateful for the Commission's historically bipartisan efforts to support backup power deployment for wireless infrastructure. *See Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies, et al.,* WT Docket No. 13-238, *et al.,* Report and Order, 29 FCC Rcd. 12865 (rel. October 21, 2014) (amending the definition of "transmission equipment" to explicitly include backup power); Wireless Telecommunications Bureau Announces Execution of Second Amendment to The Nationwide Programmatic Agreement for The Collocation of Wireless Antennas, Public Notice, 35 FCC Rcd. 7150 (July 10, 2020) (eliminating review under Section 106 of the National Historic Preservation Act for certain collocations that involve a limited expansion beyond the boundaries of a tower site).

[4] *See NPRM* at ¶ 3. *See also,* NPRM pp. 45-46, Statement of Commissioner Geoffrey Starks ("During the 2020 earthquakes in Puerto Rico, the overwhelming majority of cell-site outages resulted from power loss, not damage to facilities.")

networks running during disaster events. The NPRM seeks comment on a variety of topics regarding industry efforts on backup power, including the current state of backup power implementation, factors considered when deploying backup power solutions, and steps taken to help ensure the availability of on-site backup power during emergencies.[5]

a. American Tower's Shared Generator Program

In 2010, American Tower launched our shared generator program. The program is a voluntary turn-key solution fully managed by American Tower that allows our carrier customers to share backup power sources at American Tower sites (i.e., one generator provides backup power for multiple carriers on one tower site). To date, we have deployed around 5,000 shared generators at American Tower sites. These generators are deployed at American Tower sites that our carrier customers identified as located in high-traffic areas particularly vulnerable to power outages.

To help ensure the availability of these shared generators during emergencies, American Tower's Network Operations Center provides 24/7 remote site monitoring for each shared generator in our program. This remote monitoring provides American Tower with real-time data on the condition and status of each generator, allowing American Tower to quickly address issues that could prevent continuous backup power at each site. Further, preventive maintenance protocols, weekly automated testing, and regularly scheduled load-bank testing help American Tower ensure our shared generators are well maintained and ready for service when sites experience a loss of power from the grid. Finally, American Tower has nation-wide refueling agreements that automatically trigger refueling of a generator when 60% tank capacity is reached, so as long as the site remains accessible, our shared generators will receive a continuous

[5] *See NPRM* ¶¶ 38-39.

supply of fuel to keep running, regardless of tank capacity. American Tower's on-site shared generator program has yielded considerable benefits for carrier customers that participate in the program.

b. Benefits of On-Site Backup Power

American Tower's on-site shared generator program has provided significant benefits for our participating carrier customers. Since 2010, American Tower's shared generators have provided over 420,000 hours of backup power due to outages, with over 90,000 hours of power provided due to outages in 2020 alone. The success of our shared generator program is largely due to the joint efforts of our carrier customers and American Tower's operations personnel.

American Tower's carrier customers are instrumental when it comes to shared generator deployment, primarily because the deployment of backup power solutions is a site-specific determination. While American Tower can deploy and operate shared generators on our sites, we rely heavily on our carrier customers to identify which sites are the most important to their network operations and to identify their specific needs at each site.[6] Deploying backup power at a carrier's most important sites means that a carrier's network can continue operating even if some nearby sites experience outages as a result of power or other equipment failure. This collaboration and site-specific analysis are critical to successful backup power deployments and overcoming regulatory and practical challenges to deployment of on-site backup power.

c. Challenges for On-Site Backup Power

Despite the success of American Tower's shared generator program, many challenges outside of the control of service providers and infrastructure owners can limit on-site backup power

[6] *See* T-Mobile Comments at 4 (noting that backup power solutions have been installed at key sites); AT&T Comments at 7-8 (noting that the type of backup power solution used depends on certain factors); Verizon Comments at 9 (noting that extra steps are taken at critical coverage sites without permanent backup power on site).

deployments. Determining where we can successfully deploy shared on-site generators requires American Tower and our carrier customers to collaboratively review and overcome potential regulatory and practical challenges on a site-by-site basis. Given these site-specific considerations, the Commission should move cautiously when considering regulations on backup power requirements and ensure that carriers and their infrastructure partners have flexibility in deploying appropriate backup power solutions.

Regulatory challenges sometimes limit backup power deployments. For example, regulatory barriers such as state and local permitting requirements sometimes limit where backup power can be deployed. Federal and state regulators could help encourage wireless network resiliency by facilitating permitting improvements for future resiliency needs.[7]

Moreover, practical limitations can make deployment of backup power unfeasible or impossible at particular sites. For example, a tower compound may not be large enough to accommodate an appropriately sized generator and it may be overly burdensome or impossible for American Tower to obtain more land rights outside of the compound. Further, American Tower may need to obtain consent to deploy backup power at sites where American Tower does not own the land, which is not always granted.

III. CONCLUSION

There is no one-size-fits-all solution to improving wireless network resilience, but the wireless industry is committed to working together to develop solutions to keep wireless

[7] American Tower greatly appreciates the Commission's recent efforts to streamline permitting approvals in both its 5G Upgrade Order and Compound Expansion Order, which could further assist deployment of backup power should they survive their legal challenges. *See Implementation of State and Local Governments' Obligation to Approve Certain Wireless Facility Modification Requests Under Section 6409(a) of the Spectrum Act of 2012*, WT Docket No. 19-250, RM-11849, Declaratory Ruling and Notice of Proposed Rulemaking, 35 FCC Rcd. 5977 (rel. June 10, 2020); *Implementation of State and Local Governments' Obligation to Approve Certain Wireless Facility Modification Requests Under Section 6409(a) of the Spectrum Act of 2012*, WT Docket No. 19-250, RM-11849, Report and Order, 35 FCC Rcd. 13188 (rel. Nov. 3, 2020).

networks online. While American Tower's shared generator program is only a small part of our carrier customers' efforts on network resiliency, it represents one successful, innovative approach to maintaining power at communications sites during times of crisis. Challenges to network resiliency do exist, but targeted assistance from policymakers can help to pave the way for more resilient networks.

Respectfully submitted,

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